



Opinion of the European Economic and Social Committee

**Proposal for a Regulation of the European Parliament and of the Council amending
Regulation (EU) 2024/2865 as regards dates of application and transitional provisions**

and

**Proposal for a Regulation of the European Parliament and of the Council amending
Regulations (EC) No 1272/2008, (EC) No 1223/2009 and (EU) 2019/1009 as regards
simplification of certain requirements and procedures for chemical products**

COM(2025) 526 final – 2025/526(COD)

COM(2025) 531 final – 2025/531(COD)

(C/2026/69)

Rapporteur-General: **John COMER**

Advisor	Frank ALLEN
Legislative procedure	EU Law Tracker
Referral	European Parliament, 8.9.2025 Council of the European Union, 15.9.2025
Legal basis	Article 114 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2025) 526 final, COM(2025) 531 final
Relevant Sustainable Development Goals (SDGs)	SDG 9 – Industry, innovation and infrastructure SDG 3 – Good health and well-being SDG 12 – Responsible consumption and production SDG 15 – Life on land
Section responsible	Agriculture, Rural Development and the Environment
Adopted at plenary session	23.10.2025
Plenary session No	600
Outcome of vote (for/against/abstentions)	224/1/11

1. RECOMMENDATIONS

The European Economic and Social Committee (EESC)

1.1. welcomes the sixth Simplification Omnibus, which introduces targeted changes to EU chemical, cosmetic and fertilising product regulations to reduce compliance burdens, improve clarity and support innovation without compromising safety. The EESC accepts the general thrust of the Commission proposals and welcomes their aim of ensuring a high level of protection for human health and the environment, while urging that this be pursued in full consideration of the One Health approach ⁽¹⁾;

⁽¹⁾ Opinion of the European Economic and Social Committee – Healthy planet for healthy people: towards a comprehensive ‘One Health’ approach (own-initiative opinion) (OJ C, C/2026/16, 16.1.2026, ELI: <http://data.europa.eu/eli/C/2026/16/oj>).

1.2. underlines that it is important for a consumer to be able to quickly contact a supplier in a situation where immediate contact is necessary. Contact by telephone is the best means to achieve this and facilitates the easy exchange of information as required. Digital contacts do not always give the information required in a suitable manner;

1.3. notes that some websites can be quite complex and difficult to navigate. Suppliers must provide easy access and a user-friendly digital contact;

1.4. stresses that updating labels without undue delay in the event of a change regarding the classification or labelling of a substance or mixture – resulting in the addition of a new hazard class or in a more severe classification that requires new supplemental information on the label – is far too vague and quite unsatisfactory in terms of public health and the environment. There needs to be a fixed period to update labels. While the previous limit of six months was too short, nevertheless, a fixed period of 12 months to update the label is necessary. If an extension of the fixed period is required, then the Commission needs to be provided with adequate evidence to justify such an extension;

1.5. emphasises that good-quality labelling is an important part of protecting public health and the environment. It is necessary to establish certain rules to ensure that labels are easily readable and fulfil the role for which they were intended. Labels should be printed in red or black on a white background to ensure easy readability. In exceptional circumstances it may be necessary to vary this somewhat but the underlying requirement must be easy readability and clear and legible words adequately spaced;

1.6. recommends that a derogation for carcinogenic, mutagenic and reprotoxic substances (CMR) whose hazard statements refer to oral or inhalation routes of exposure should be allowed except where it can be demonstrated that children and other vulnerable groups are at particular risk;

1.7. underlines that economic aspects should only be taken into account where excessive economic costs apply or where the alternative product is totally economically unviable when deciding whether a substance is to be considered a suitable alternative to a CMR substance in a cosmetic product. In particular, small and medium sized enterprises (SMEs) should receive support to invest in alternative products. Public health is too important for economic considerations to be over emphasised as a determining factor when looking at suitable alternatives to CMR substances in such products;

1.8. stresses the need for the Scientific Committee on Consumer Safety (SCCS) to quickly assess endocrine disruptors as they can interfere with the body's natural hormones. Children, in particular, are at risk because endocrine disruptors might cause disruptions during key developmental moments in their life.

2. EXPLANATORY NOTES

Arguments in support of recommendations 1.2 and 1.3

2.1. While digital contacts are useful and effective, nevertheless, telephone contact is necessary and extremely effective when a consumer requires an immediate answer to a particular query. The website may not even address the query that a customer has, while a conversation on the telephone ensures a constructive exchange of views and information where the need for information and clarity is immediate. In addition, many websites can be quite complex and difficult to navigate, so it is essential that, in the case of a digital contact, the customer encounters a user-friendly website that is easily contactable and ensures that they have easy access to all necessary information.

Arguments in support of recommendation 1.4

2.2. Updating a label without undue delay in the event of a change regarding the classification or labelling of a substance or mixture is far too vague and, in reality, almost meaningless. A clear deadline must be set to regulate the updating of labels. A period of 12 months seems reasonable, combined with a facility to extend the period, provided the Commission is satisfied that there is adequate evidence to justify such an extension.

Arguments in support of recommendation 1.5

2.3. The consumer is dependent on good-quality labelling in order to determine the contents of a product. Labels must be easy to read and visibly stand out on the product to which they are attached. Labels should be printed in red or black on a white background so that they are clearly visible and easily readable. In exceptional circumstances it may be necessary to vary this proposal slightly but the underlying condition must be satisfied, namely that the label is easily readable and very visible, with words and lines adequately spaced.

Arguments in support of recommendation 1.6

2.4. The Commission proposal for a new exemption for CMR substances whose hazard statements refer to oral or inhalation routes of exposure is too wide ranging. This proposed exemption disregards the fact that small children, who are already vulnerable to CMR substances due to their low body weights, are prone to accidentally swallowing products that are used on them. This proposal would increase the risk of serious health effects in children and other vulnerable groups by introducing a way of keeping some CMR substances in cosmetics and personal care products. This exemption should be allowed except where it can be demonstrated that children and other vulnerable groups are at particular risk.

Arguments in support of recommendation 1.7

2.5. One of the Commission proposals is that, before a substance can be considered a suitable alternative to a CMR substance in a cosmetic product, it must be economically viable. When developing an alternative to a CMR substance economic costs should only be taken into account when they are found to be excessive and when such costs would result in excessive charges to the consumer or where the alternative is totally economically unviable. In particular, small and medium sized enterprises (SMEs) should receive support to invest in alternative products.

Arguments in support of recommendation 1.8

2.6. Cosmetic products are a major direct source of consumer exposure to endocrine disrupters, including for children and other vulnerable groups. One of the problems is that the scientific evidence in the case of some endocrine disrupters is not always conclusive. Therefore, the precautionary principle should apply so as to protect public health and the environment, especially in the case of children and vulnerable groups.

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1

linked to recommendations 1.2, 1.3, 1.4 and 1.5

Article 1 of the proposal COM(2025) 531, amending Regulation (EU) No 1272/2008

Text proposed by the European Commission	EESC amendment
Article 1 Amendments to Regulation (EC) No 1272/2008 Regulation (EC) No 1272/2008 is amended as follows: (1) in Article 2, the following point is added: ‘42. “digital contact” means any up-to-date and accessible online communication channel through which a supplier can be reached or engaged without the need to register or to download an application.’;	Article 1 Amendments to Regulation (EC) No 1272/2008 Regulation (EC) No 1272/2008 is amended as follows: (1) In Article 2, the following point is added: ‘42. “digital contact” means any up-to date and accessible online communication channel through which a supplier can be reached or engaged without a need to register or to download an application’;

Text proposed by the European Commission	EESC amendment
(2) in Article 17(1), point (a) is replaced by the following: '(a) the name, address and digital contact of the suppliers;';	(2) in Article 17(1) point (a) is replaced by the following: '(a) the name, address, telephone number and digital contact of the suppliers (the digital contact must be user-friendly and easy to connect to);';
(3) in Article 25(6), the third subparagraph is replaced by the following: 'The label shall also include the product identifier referred to in Article 18 and the name, address and digital contact of the supplier of the mixture.';	(3) in Article 25(6), the third subparagraph is replaced by the following: 'The label shall also include the product identifier referred to in Article 18 and the name, address, telephone number and digital contact of the supplier of the mixture. The digital contact must be user-friendly and easy to connect to. ';
(4) in Article 29, paragraph 2 is replaced by the following: '2. The label elements set out in Article 17(1) may be reduced in accordance with the rules set out in section 1.5.2 of Annex I.'	(4) in Article 29 paragraph 2 is replaced by the following: '2. The label element set out in Article 17(1) may be reduced in the accordance with the rules set out in section 1.5.2 of Annex I.'
(5) in Article 30, paragraph 1 is replaced by the following: '1. In the event of a change regarding the classification or labelling of a substance or a mixture, which results in the addition of a new hazard class or in a more severe classification, or which requires new supplemental information on the label in accordance with Article 25, the supplier of that substance or that mixture shall ensure that the label is updated without undue delay after the results of the new evaluation referred to in Article 15(4) are obtained by, or communicated to, that supplier.'	(5) in Article 30, paragraph 1 is replaced by the following: '1. In the event of a change regarding the classification or labelling of a substance or a mixture, which results in the addition of a new hazard class or in a more severe classification, or which requires new supplemental information on the label in accordance with Article 25, the supplier of that substance or that mixture shall ensure that the label is updated within 12 months after the results of the new evaluation referred to in Article 15(4) are obtained by, or communicated to, that supplier. A delay of a further 12 months can be obtained if the Commission is satisfied that valid reasons exist to grant such an extension. ';
(6) in Article 31, paragraph 3 is replaced by the following: '3. The label elements referred to in Article 17(1) shall be clearly and indelibly marked. They shall stand out clearly from the background and they shall be of such a size and be spaced in such a way as to be easily read.'	(6) in Article 31, paragraph 3 is replaced by the following: '3. The label elements referred to in Article 17(1) shall be clearly and indelibly marked. Labels should be printed in red or black on a white background unless it is necessary to do otherwise due to exceptional circumstances. There must be adequate spaces between words and lines. They shall stand out clearly from the background and they shall be of such a size and be spaced in such way as to be easily read.'

Reason

The telephone provides the quickest and easiest means of immediate communication when such is required. Updating labels is too important to be determined by no undue delay. Clarity of labelling is most important.

Amendment 2

linked to recommendations 1.6 and 1.7

Article 2 of the proposal COM(2025) 531, amending Regulation (EU) 1223/2009

Text proposed by the European Commission	EESC amendment
(2) Article 15 is amended as follows: (a) paragraph 2 is amended as follows: (i) the second subparagraph is replaced by the following: ‘2. However, such substances may be used in cosmetic products if a derogation request is submitted to the Commission at the latest three months after at the date of entry into force of the amendments to Part 3 of Annex VI to Regulation (EC) No 1272/2008 classifying the substance as CMR substance of category 1A or 1B. The Commission shall grant the derogation where all of the following conditions are fulfilled: (a) there are no suitable alternative substances available as documented in an analysis of alternatives; (b) the substances have been evaluated and found safe by the SCCS for a particular use of the cosmetic product category, considering exposure to those products, overall exposure from sources other than cosmetics and of vulnerable population groups.’.	(2) Article 15 is amended as follows: (a) paragraph 2 is amended as follows: (i) the second subparagraph is replaced by the following: ‘2. However, such substances may be used in cosmetic products if a derogation request is submitted to the Commission at the latest three months after at the date of entry into force of the amendments to Part 3 of Annex VI to Regulation (EC) No 1272/2008 classifying the substance as CMR substance of category 1A or 1B. The Commission shall grant the derogation where all of the following conditions are fulfilled: (a) there are no suitable alternative substances available as documented in an analysis of alternatives; (b) the substances have been evaluated and found safe by the SCCS for a particular use of the cosmetic product category, considering exposure to those products, overall exposure from sources other than cosmetics and of vulnerable population groups; (c) notwithstanding point (b) above, the SCCS should be very reluctant to grant a derogation to a CMR substance in cosmetic products where the oral or inhalation route of exposure is a factor. This is particularly relevant in the case of vulnerable groups. Where the balance of probability indicates a particular risk to vulnerable groups due to an increased risk of oral or inhalation exposure, then the derogation should only be granted in exceptional circumstances; (d) the European Commission shall mandate the SCCS to speedily assess endocrine disruptors, especially where they apply to children.’.

Text proposed by the European Commission	EESC amendment
(ii) The third subparagraph is replaced by the following; For the purpose of the second subparagraph, point (a), a substance shall be considered a suitable alternative if it fulfils all the following conditions; (c) is technically feasible and economically viable;	(ii) The third subparagraph is replaced by the following; For the purpose of the second subparagraph, point (a), a substance shall be considered a suitable alternative if it fulfils all the following conditions; (c) is technically feasible and economically proportionate and not leading to excessive cost to the consumer;

Reason

Oral or inhalation exposure to CMR substances is a particular risk for vulnerable groups, especially children. Derogations should not be granted if there is a particular risk to vulnerable groups due to oral or inhalation exposure from cosmetic or personal care products.

Brussels, 23 October 2025.

The President
of the European Economic and Social Committee
Séamus BOLAND